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**Annual 47 C.F.R. Section 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

FEB 19 2008

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Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 15, 2008

Name of company covered by this certification: Wamego Telecommunications Co, Inc.

Form 499 Filer ID: 820079

Name of signatory: Steven L. Sackrider

Title of signatory: President / General Manager

I, Steven L. Sackrider, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. Section 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.* instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



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**Annual 47 C.F.R. Section 64.2009(e) CPNI Operating  
Procedures Compliance Statement EB Docket 06-36**

This Operating Procedures Compliance Statement for Wamego Telecommunications Company, Inc (WTC) explains how the established operating procedures ensure the company's compliance with the CPNI rules in this subpart. All WTC employees will be trained annually on the Operating Procedures for properly safeguarding all customers CPNI.

**Section 64.2005 Use of customer proprietary network information without customer approval.**

WTC's operating procedures dictate that WTC employees are allowed to use, disclose, and permit access to CPNI for the purpose of providing or marketing service offerings among the categories of services to which a customer already subscribes without the customer's approval.

Those procedures allow that for any different categories of services provided by WTC or any of its affiliates and to which more than one service is subscribed to by a customer, WTC is permitted to share CPNI among the other WTC affiliated entities that provide a service offering to the customer.

If the customer does not subscribe to more than one of WTC's offerings, then the company does not share CPNI with any of its affiliates, except as provided in Section 64.2007(b).

Under the operating procedures, WTC does not use, disclose, or permit access to CPNI to market to a customer those service offerings that are within the category of service to which the subscriber does not already subscribe, unless WTC has customer approval to do so, except for the provisioning of inside wiring installation, maintenance, and repair services, as well as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, certain Centrex features.

WTC may also use, disclose, or permit access to CPNI derived from its provision of local exchange service or interexchange service, without customer approval, for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversions.

WTC may also use, disclose or permit access to CPNI to protect the rights of its property, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

**Section 64.2007 Approval required for use of customer proprietary network information.**

WTC, as outlined in its operating procedures, may obtain approval to use CPNI through the appropriate written, oral or electronic methods. Oral approval or disapproval is noted in the customer's account within WTC's billing software. Any method of approval or disapproval will remain in effect until the customer revokes or limits such approval or disapproval and are kept on file for at least one year.

WTC utilizes the opt-out approval method to use the customer's individually identifiable CPNI for the purposes of marketing communications-related services to that customer.

#### **Section 64.2008 Notice required for use of customer proprietary network information**

WTC's procedures provide for a written opt-out notification to all our customers every (2) years. It effectively satisfies each of the requirements as specified in this section. The record of notification is kept on file at WTC for (2) years as required. It meets all of the provisions of Section 64.2008 (a), (b), (c), and (d) that pertain to general notification and specifically a written opt-out notification process.

WTC uses oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call only as specified by WTC's operating procedures.

#### **Section 64.2009 Safeguards required for use of customer proprietary network information.**

WTC has implemented a CPNI status system within our billing software that is utilized by our employees prior to the use of CPNI.

An extensive annual training session for all employees, followed by a supervisory review process regarding compliance with CPNI rules in this subpart, is adhered to for outbound marketing situations and is maintained on file for (2) years. As outlined in the operating procedures, sales personnel are required to obtain supervisory approval for any outbound marketing request for customer approval.

As specified in the operating procedures, WTC will notify the Commission by letter within (5) business days of any instance where the opt-out mechanism has not worked. There have been no such instances in 2007.

#### **Section 64.2010 Safeguards on the disclosure of customer proprietary network information**

WTC has developed through our operating procedures extensive safeguards that have reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. WTC employees are following procedures designed to authenticate all customers prior to disclosing CPNI based on customer-initiated telephone contact, online account access, or an in-store visit.

The company has developed operating procedures that allow WTC employees to disclose call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides the carrier with a password that does not use readily available biographical information or account information. These WTC procedures address all of the rules associated with telephone access to CPNI as found in Part (b) of Section 64.2010.

For online access to CPNI, WTC by virtue of its operating procedures authenticates customers without the use of readily available biographical information or account information prior to online access utilizing our proprietary software. Once authenticated, a password is required to access CPNI

related to a telecommunications service, again without the use of readily available biographical information.

In-store access to CPNI is provided only when customers present WTC with a valid photo ID that matches the customer's account information. This is also specified in the operating procedures.

Once a customer has established a password without the use of readily available biographical information, our proprietary software has provisions to establish a back-up customer authentication method in the event of a lost or forgotten password. If the customer is not able to provide the correct password or alternate back-up authentication method for their password, our operating procedures require the customer to go through to establish a new password.

WTC requires by virtue of its operating procedures that customers be notified by mail whenever a password, customer response to back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

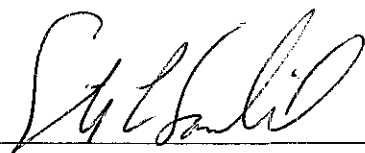
WTC does not allow business customer exemptions as related to CPNI, as specified in our operating procedures.

#### **Section 64.2011 Notification of customer proprietary network information security breaches**

As required by FCC CPNI rules, and as outlined in WTC's operating procedures, law enforcement notification procedures are strictly adhered to. Our proprietary software has the ability to record the date of the breach discovery, who discovered the breach, and the resulting electronic notifications to both the United States Secret Service and the Federal Bureau of Investigation no later than 7 days from the date of the discovery of the breach.

As dictated in WTC's operating procedures, WTC will not notify the customer or disclose the breach to the public until 7 full business days after notification to the USS and the FBI, except as provided in paragraphs (b)(2) and (b)(3) of this section.

A record of these discovered breaches will be maintained electronically on our proprietary billing software for (3) years.

Signed  \_\_\_\_\_

Date 2/15/08

Steven L. Sackrider, President / General Manager WTC

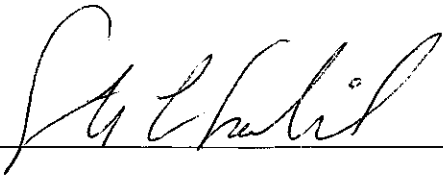
**Action taken by WTC against data brokers for unauthorized release of CPNI**

There were no actions taken against data brokers by WTC during the 2007 calendar year.

**Customer complaints received by WTC for unauthorized release of CPNI**

No customer complaints concerning the unauthorized release of customer proprietary network information were received by WTC during calendar year 2007.

Signed



Steven L. Sackrider, President / General Manager WTC

Date

2/15/08